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Joan Marsh  
Director  
AT&T Federal Government Affairs

Suite 1000  
1120 20th St. NW  
Washington, DC 20036  
202 457-3120  
FAX 202 457-3110

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July 2, 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW, Room TWB-204  
Washington, DC 20554

Re: Notice of Written Ex Parte  
Second Application of BellSouth Corporation, BellSouth  
Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision  
of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121

Dear Ms. Salas:

This is to inform you that AT&T has made a written ex parte to William Agee, an attorney with the Commission's Common Carrier Bureau. That ex parte consists of a Summary of Key Differences between the Third Party Test Plan being used in New York and the Test Plan adopted by the Georgia Public Service Commission. The Summary is supported by a more detailed matrix comparison of the two plans.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to be "W. Agee", with a long horizontal line extending to the right.

cc: W. Agee  
A. Kearney  
C. Pabo

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Joan Marsh  
Director  
AT&T Federal Government Affairs

Suite 1000  
1120 20th St. NW  
Washington, DC 20036  
202 457-3120  
FAX 202 457-3110

July 2, 1999

William Agee  
Common Carrier Bureau  
Federal Communications Commission  
445 Twelfth Street, SW, Room 5-C231  
Washington, DC 20554

Re: Written Ex Parte  
Second Application of BellSouth Corporation, BellSouth  
Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision  
of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121

Dear Bill:

In connection with our prior discussions on this matter, enclosed please find a Summary of Key Differences between the Third Party Test Plan being used in New York and the Test Plan adopted by the Georgia Public Service Commission. The Summary is supported by a more detailed matrix comparison of the two plans.

Sincerely,

A handwritten signature in black ink, consisting of a stylized, cursive "A" followed by a long horizontal line extending to the right.

## **Summary of Key Differences between the New York and Georgia Third Party Test Plans**

### **Introduction (see attached matrix, page 1)**

In New York, KPMG developed a plan intended to evaluate the entire CLEC/ILEC relationship under real world conditions. While BellSouth's plan is purportedly based on the New York plan, it has been adapted to conform to the Georgia Test Plan Order in which the Commission concluded that it did not believe that "a full third party audit of all interfaces and services is necessary at this time."

As a result, the New York plan is much more comprehensive in scope than the Georgia plan. This is due not only to the limited requirements of the Georgia Order, but also to BellSouth's interpretation of the Georgia Order. For example, while in the real world maintenance and repair of newly installed services is a problem, in its test scope BellSouth mitigates this issue as follows: "Maintenance and repair trouble reporting transactional tests for new installs will be staggered in time such that any gaps between actual customer service activation and completion notice delivery will be addressed." In the real world, a customer's need for maintenance and repair cannot be "staggered" to accommodate the RBOC's inability to timely complete orders.

Importantly, CLECs were involved in the development and implementation of the test plan in New York. By contrast, CLEC and actual CLEC orders have no role in the Georgia plan. This is true even where the Georgia Commission specifically ordered an audit of BellSouth's performance on actual CLEC orders. As will be discussed below, BellSouth specifically declined to include in its test plan the mandate by the Georgia Commission to audit its actual flow through performance on 3 months worth of CLEC orders. Finally, the Georgia test plan is not an "independent" plan; BellSouth prepared the test plan and engaged the testers. This stands in stark contrast to the foundations of the New York review.

### **Test Plan Framework (see attached matrix, pages 2-3)**

Unlike the New York test plan, BellSouth's framework does not allow for a review of retail operations or a comparison of test results to retail results. BellSouth's plan also does not have an equivalent operational review to the "Relationship Management" and "Infrastructure" domains found in the New York plan. This means, for example, that neither BellSouth's change management processes nor its processing of manual orders will be evaluated or reviewed.

BellSouth's plan does not contain the level detail on the test transaction generator as found in the New York plan, but it appears that the third party tester will NOT build an

interface to test BellSouth's OSS, but will instead use BellSouth facilities and internal test mechanisms.

BellSouth's plan does not contain as much information as the New York plan regarding evaluation criteria. The BellSouth plan provides some information on how defects will be handled, but leaves much open to speculation. For example, the plan calls for three levels of severity of defects. It is not clear if all defects would fall into one of the three categories, or if some would fall outside the exception process. The severity definitions appear to be system or software related, but are also applied to other areas, e.g. provisioning and document review. Additionally, while the plan calls for re-testing following appropriate corrective measures, this process only applies to an undefined "significant" number of test conditions that fail or are not covered.

The Georgia plan leaves the expected results for any test fully undefined. Indeed, the criteria for creating the definition are also not provided. And the New York plan has a more robust set of global entrance criteria.

Finally, the Georgia plan relegates the role of KPMG to the role of an auditor reviewing outcomes, giving the roles KPMG conducted in New York to HP. These changes severely limit the ability of these firms to take advantage of the experiences gained in the New York test. Additionally, the Georgia plan is simply unclear as to who will perform the role of the test manager, performed by KPMG in New York.

#### **Pre-Ordering, Ordering, and Provisioning (see attached matrix, pages 4-8)**

Many areas of evaluation present in New York are omitted from the Georgia plan, including the evaluation of: (a) GUI interfaces; (b) live CLEC order processing; (c) manual order processes; (d) resale functional testing; (e) work center support; and (f) parity in provisioning.

In those areas where evaluations are being conducted in both New York and Georgia, the New York plan is more comprehensive. For example, the New York plan seeks to fully evaluate and "validate" the "existence, functionality, and behavior of the interface" and the "capture, tracking, and reporting of...metrics." The Georgia plan does neither of these. Functional evaluation is end-to-end in New York, ensuring that the process is tested from pre-ordering all the way through to actual provisioning and maintenance and repair. The Georgia plan does not include an end-to-end evaluation.

Indeed, functional evaluation is extremely limited in scope in the Georgia plan. Only 5 (of 80) UNEs will be tested; and resale and interconnection will not be tested at all. Neither LENS (the interface currently used by most CLECs) nor manual ordering will be tested. Most notably, testing will not include critical improvements planned for an ordering upgrade that will be carrier-to-carrier tested in August and implemented in September.

In some respects, BellSouth is not even conducting its evaluation in compliance with the Georgia Order. For example, no interface will be built to the EDI mainframe, and the mainframe will not be part of the test. The test plan is particularly lacking in its review of BellSouth's "flow through" performance. Despite the fact that the Georgia Order called for a "full audit of the latest three months of data underlying BellSouth's percent flow through service request report" (as submitted monthly in docket 7892-U), BellSouth is instead conducted a "flow through" audit of only the extremely restricted order types included in the test data.

The New York provisioning process review is much more comprehensive and is conducted using live CLEC cases. The BellSouth plan is much more orchestrated and far removed from real-world operating conditions. For example, the Georgia plan appears to allow the testers to obtain the provisioning time from the FOC, which is not available to CLECs. Also, the plan appears to require the testers to "meet BellSouth provisioners for appointment", as opposed to having access to provisioning activities and/or the freedom to do random (and unannounced) observations.

#### **Maintenance and Repair (see attached matrix, pages 9-12)**

The test plans differ significantly in the scope of the maintenance and repair review. Unlike the New York plan, under the Georgia plan:

- The physical work performed by BellSouth personnel associated with Maintenance and Repair will not be reviewed or tested.
- There is no TAFI volume test.
- There is no review to evaluate the equivalence of BellSouth's end-to-end processes for trouble reporting and retail wholesale services.
- There is no review or testing of "build" requirements and specifications of ECTA and TAFI.
- There is no review of joint coordination processes for maintenance and repair.
- There is no work center support evaluation.

#### **Billing (see attached matrix, pages 13-16)**

In sharp contrast to the New York plan, BellSouth's plan provides for no comparison to retail, no metrics validation, no review against standards, no work center evaluation, and no bill certification process evaluation. The billing documentation evaluation will not determine whether system functionality matches functionality

described in BST documentation. Bills are not reviewed against test calls to determine accuracy. Claims are only tested for usage, not invoices.

In some ways, the test plan makes no sense. For example, the BellSouth plan refers to scenarios in Appendix A when that appendix has no scenarios. Moreover, the test scenarios in Appendix B-4 are not descriptive of the tests that should be conducted to test functionality of usage, and are extremely limited tests of functionality. Finally, the Georgia plan contains no testing of the BellSouth Industrial Billing System, which is replacing CABS and CRIS and which BellSouth claims has been in operation since August 1998.

#### **Relationship Management and Infrastructure (see attached matrix, pages 17-19)**

As discussed above, the Georgia plan is silent on the evaluation of relationship management and infrastructure. More specifically, the Georgia plan does not address any of the following objectives found in the New York plan:

- Interface Development Verification and Validation Review
- Account Establishment and Management Verification and Validation Review
- Account Establishment and Management Performance Data Review
- Network Design Request, Collocation, and Interconnection Planning  
Verification and Validation Review
- System Administration Help Desk Functional Review
- System Administration Help Desk Performance Data Review
- System Administration Help Desk Verification and Validation Review
- CLEC training verification and validation review

Additionally, BellSouth's plan to review change control is inadequate. The plan focuses only on the Electronic Interface Change Control process which does not cover the way most changes are made to the interfaces and the related documentation. Further, the review of the change control process involves only document review and interviews with BellSouth personnel. There will be no CLEC input, no observation of actual change control processes or activities and no evaluation of CLEC usage of the process.

#### **Volume (see attached matrix, page 21)**

The methodology for establishing volumes and product types is defined in the New York plan in much more detail than in the Georgia plan. For example, the New York plan provides specifics on the normal and peak volume amounts tested; the Georgia plan does not.

**Performance Metrics (see attached matrix, page 22)**

The New York plan contains standards for many quantitative metrics (including parity with retail) or states that standards are to be determined. Qualitative metrics have criteria/norms and standards defined and the plan describes the statistical approach to be used.

The BellSouth plan has no standards defined for performance metrics. No qualitative metrics have criteria/norms and standards defined. It states that evaluation criteria will be developed for each test to determine whether the results deviate from expectations, which remain undefined. In those cases where results deviate, statistical analysis will be undertaken to determine the significance of the deviation, but the statistical process also remains undefined.

In short, the BellSouth plan is not designed to test whether BellSouth is providing CLECs the same quality of service it provides itself. No aspect of BellSouth's retail performance is reviewed, including its documentation, on-site observation of its performance for itself, or its performance results data for itself. The plan merely requires the testers to collect data on the test and BellSouth to collect data on the test, and then recommends comparison of the results of the collected data based on undefined criteria. The performance measures to be used will not be validated.

\* \* \* \* \*

This is just a brief summary of some of the key differences between the two test plans. These differences are explored in more detail in the side-by-side discussion of the two plans, attached.

# **KEY DIFFERENCES BETWEEN OBJECTIVES IDENTIFIED IN THE NEW YORK AND GEORGIA THIRD PARTY TEST PLANS**

## **Introduction**

New York (TAB 2 of Test Plan)	Georgia (TAB 2 of Test Plan))
<p>Scope:</p> <p>In determining the depth and breadth of the test, all stages of the CLEC/ILEC relationship were considered, including establishing the relationship, performing daily operations, and maintaining the relationship.</p> <p>Each of the service delivery methods, resale, unbundled network elements, including combinations and the platform, were included.</p> <p>The domains or areas of the test are:</p> <p>Pre-ordering, Ordering, and Provisioning Maintenance and Repair Billing Relationship Management and Infrastructure</p> <p>Scenarios to be tested were developed with input from the PSC, BA-NY, and the CLECs.</p> <p>From Objective (Section C) KPMG has developed a test plan that is intended to provide adequate depth and breadth to evaluate the entire CLEC/ILEC relationship under real world conditions.</p> <p>14 Assumptions (Section E)</p>	<p>Scope:</p> <p>The scope of the BellSouth-Georgia OSS Evaluation Test was based on the Bell Atlantic – New York test plan and adapted to conform to the Georgia Order to create this master test plan.</p> <p>Simple resale and four complex resale services are included for volume testing. UNE 2 wire analog loops and ports, 2 wire analog loop/port combos, and INP/LNP will be tested for functionality and volume.</p> <p>Pre-Ordering, Ordering, Provisioning, Maintenance and Repair, and Billing will be tested.</p> <p>Scenarios were not addressed, however, the role of the CLECs was described as “to provide their comments as stipulated in the Georgia Order.”</p> <p>From Objectives (Section C) The overall goal of this document is to provide a comprehensive description of the plan to test BST’s OSS systems, interfaces, information, and processes in accordance with the Georgia Order.</p> <p>20 Assumptions (Section E)</p> <p>(Included limiting factors such as the omission of retail review, limitations established by the Georgia Order, staggering of M&amp;R following completion of new installations, etc.</p>

**Key Differences Between Objectives Identified in  
the New York and Georgia Third Party Test Plans**

**Test Plan Framework**

New York (TAB III of Test Plan))	Georgia (TAB III of Test Plan))
<p><b>Framework Dimensions</b></p> <p>--Test Domains (What to be tested)</p> <p>--Test Scenarios (What to be tested)</p> <p>--Test Processes (How testing conducted)</p> <p>--Evaluation Criteria (How testing conducted)</p> <p>Many transaction-driven tests utilize a Test Transaction Generator (TTG) to facilitate testing referenced in Section C 1.0 and further described in 1.1) <i>(The Test Transaction Generator will be required to document its ability to build, test, and place in operation the functionality required to successfully process transactions using BA-NY's documentation, account management, help desk, and training support.)</i></p> <p>CLEC live test cases will be used and CLEC live production continuous monitored.(Section C 1.2 and 1.3)</p> <p><b>Evaluation Criteria (Section D)</b></p> <p>Quantitative, Qualitative, Parity, and Existence Determined by legal and regulatory requirements, consensus requirements, and good management practices.</p>	<p><b>Framework Dimensions</b></p> <p>--Business Processes (Pre-Order, Order, M&amp;R, Billing, Forecasting, and Change Management)</p> <p>--Interfaces (TAG, EDI, TAFI, ECTA, ODUF, ADUF, CRIS, CABS)</p> <p>--Test Objectives (Functionality, Performance, Volume, Scalability, Documentation)</p> <p>--Product Categories (Resale and UNE)</p> <p>Functional testing will use test tools (Section B)</p> <p>Volume testing will be tested via test transaction generators (not described)</p> <p><i>Not part of the BellSouth test.</i></p> <p><b>Evaluation and Results (Section C)</b></p> <p>Includes comparing expected results with the actual results, verifying that all test contradictions have been exercised, and severity 1, 2, and 3 failures will require re-testing.</p> <p>BellSouth announces three categories of defects, which will require re-testing, but does not describe what types of defects will not require re-testing. Additionally, BellSouth states that if a "significant" number of test conditions fail or are not covered, the test cycle will be rescheduled for execution following the implementation of the appropriate corrective measures, but does not describe what is significant or why or only the correction of</p>

**Key Differences Between Objectives Identified in  
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<p><b>New York Global Entrance Criteria (Section E) <i>(Differences)</i></b></p> <ul style="list-style-type: none"> <li>--All legal dependencies have been resolved</li> <li>--Resolutions to legal dependencies approved</li> <li>--The PSC has verified the relevant measurements to be used in the test</li> <li>--Test Transaction Generator Vendor must be operationally ready</li> <li>--CLEC facilities and personnel are available to support the CLEC elements of the test plan.</li> </ul>	<p>significant problems provides non-discriminatory treatment.</p> <p>BellSouth states that both testing and operational analysis require evaluation criteria and performance metrics and state that performance metrics are described "in detail" in Appendix B. Appendix B contains BellSouth's existing SQM which would only compare the test results captured by the third party for comparison with the test results captured by BellSouth, and provides no detail on operational analysis.</p> <p><b>Georgia Global Entrance Criteria (Section D) <i>(Differences)</i></b></p> <ul style="list-style-type: none"> <li>--Exception Reporting Process has been defined.</li> <li>--The Georgia PSC has established service quality measurements to be used in the test.</li> </ul> <p>(The Georgia PSC could require an audit of all performance measures prior to deciding that global criteria is met. (See Section III, page 6, number 3.)</p> <p><b>Georgia Global Exit Criteria (Section D) <i>(Differences)</i></b></p> <ul style="list-style-type: none"> <li>--KMPG must validate the reports.</li> </ul> <p><i>(This role is different than in New York—HP has apparently been given testing assignments that were the responsibility of KMPG in New York)</i></p>
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**Key Differences Between Objectives Identified in  
the New York and Georgia Third Party Test Plans**

**Pre-Ordering, Ordering, and Provisioning.**

New York (TAB IV of Test Plan))	Georgia (TABS IV and V of Test Plan))
<p><b>POP1:EDI Functional Evaluation:</b> to validate the existence, functionality, and <i>behavior</i> of the EDI interface to BA-NY for pre-ordering, ordering and provisioning</p> <p>The EDI Functional Evaluation will look at an <i>end-to-end</i> view of the service negotiation through the provisioning process.</p>	<p><b>Pre-1: Tag Pre-Ordering Functional Test:</b> to accurately prove the existence of TAG functionality for electronically ordered UNEs in accordance with the TAG documentation.</p> <p><b>O&amp;P-1: EDI Functional Test:</b> to accurately prove the existence of EDI functionality for electronically ordered UNEs in accordance with EDI documentation.</p> <p><b>O&amp;P-2 TAG Functional Test:</b> to accurately prove the existence of TAG functionality for electronically ordered UNEs in accordance with TAG documentation.</p>
<p><b>POP2: GUI Functional Evaluation:</b> the accuracy, completeness, and behavior of the GUI interface to BA-NY for pre-ordering, ordering, and provisioning transaction requests and responses.</p>	<p>NONE</p>
<p><b>POP3: “Live CLEC” Functional Evaluation:</b> to validate the capability and behavior of BA-NY for pre-ordering, ordering, and provisioning transaction requests and responses for those ordering, and provisioning processes that require long elapsed times or facilities that are not practical to provide in a test bed environment.</p> <p>This test allows for an element of blind testing and tracking performance in a “real world” environment.</p>	<p>NONE</p> <p>There appears to be no attempt to create any form of blind testing in the BellSouth plan. To the contrary, for each BellSouth transaction type test, the plan calls for the test cycle manager to “coordinate efforts with BellSouth to ensure that BellSouth’s performance systems is prepared to track test transaction performance prior to beginning the test” and that test transactions be submitted “according to schedule.”</p>
<p><b>POP4: Manual Order Process Evaluation:</b> to validate process and procedure used to support manual submission of orders for service.</p>	<p>NONE</p>

**Key Differences Between Objectives Identified in  
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<b>POP5: “Normal Volume” Performance Test:</b> to measure BA-NY capability to meet agreed upon functionality and measures of service for projected July/December 1999 Pre-Ordering, Ordering, and Provisioning transaction volumes.	<b>O&amp;P-3: EDI/TAG Normal Volume Performance Test:</b> to measure the performance of the EDI and TAG interface under normal projected YE01 transaction loads.
<b>POP6: “Stress Volume” Performance Testing:</b> will identify the capacity and potential choke point of the EDI interface put in place to access pre-ordering information from and submit orders to BA-NY through the use of higher than normal volumes of transactions. The GUI will not be stress tested.	<b>O&amp;P-4: EDI/TAG Peak Volume Performance Test:</b> to measure the performance of the EDI and TAG interfaces under peak projected YE01 transaction loads.
<b>POP7: Order “Flow Through” Evaluation:</b> to verify the ability of BA-NY to flow all order types agreed to in the pre-filing agreement from the CLEC through their front end system without manual intervention.	<b>GPSC</b> required full audit of the last 3 months data submitted by BellSouth in its monthly performance data filing. BellSouth’s plan does not conform to this request, BST proposes to use the 3PT test data.
<b>POP8: BA-NY POP Metrics Evaluation:</b> to evaluate the capture, tracking, and reporting of pre-ordering, ordering, and provisioning metrics required by regulatory bodies.	<p><b>O&amp;P-7: O&amp;P Performance Results Comparison:</b> to assess the accuracy of BellSouth’s wholesale performance metrics results using test transactions. (By comparing the O&amp;P performance results collected by the Test through test management tools and those collected by BellSouth’s performance measurements system.</p> <p><b>PRE-1 Pre-Ordering Performance Results Comparison</b> The objective of the Pre-Ordering Performance Results Comparison is to assess the accuracy of BellSouth’s wholesale performance metrics using results of test transactions.</p>
<b>POP9: Documentation Review:</b> evaluate to determine the accuracy, currency, availability, and usability of the POP documentation, and the compliance to industry standards of the relevant POP transactions.	<p><b>O&amp;P-8: EDI Documentation Evaluation:</b> to assess whether the documentation provided by BellSouth adequately assists CLECs in understanding how to implement and use all of the EDI functions available to them.</p> <p><b>O&amp;P-9: TAG Documentation Evaluation:</b> to assess whether the documentation provided by BellSouth adequately assists CLECs in</p>

**Key Differences Between Objectives Identified in  
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<p>The documentation evaluation is a comprehensive operational analysis of the – <u>pre-ordering, ordering, and provisioning documentation</u> used by CLECs to carry out business processes. In addition, <u>the documented interface specifications</u> will be reviewed to assess their compliance with industry specifications.</p> <p><i>(This section for documentation is only a subset of the documentation review. Many steps are also taken in New York's Relationship Management and Infrastructure domain, which the BellSouth plan does not address.)</i></p>	<p>understanding how to implement and use all of the TAG functions available to them.</p> <p><b>PRE-3 TAG Pre-Ordering Documentation Evaluation</b></p> <p>The objective of this evaluation is to assess whether the documentation provided by BellSouth adequately assists CLECs in understanding how to implement and use all of the TAG pre-ordering functions available to them.</p> <p>The documentation evaluation is an analysis of the BellSouth-provided documentation used by CLECs to <u>interact with the interface for ordering and provisioning activities.</u></p>
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**Key Differences Between Objectives Identified in  
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<p><b>POP10: Work Center/Help Desk Support Evaluation:</b></p> <ul style="list-style-type: none"> <li>■ determine completeness and consistency of work center/help desk processes and responses.</li> <li>■ determine whether the escalation procedure is correctly documented, maintained, published and followed.</li> <li>■ determine the accuracy, completeness, and functionality of procedures for measuring, tracking, projecting, and maintaining work center/ help desk performance.</li> <li>■ ensure accuracy and completeness of reasonable security measures to ensure integrity of work center/help desk data and the ability to restrict access to parties with specific access permissions.</li> <li>■ ensure the work center/ help desk effort has effective management oversight.</li> <li>■ ensure responsibilities for performance improvement are defined and assigned.</li> </ul>	<p>NONE</p>
<p><b>POP11: Provisioning Process Parity Evaluation:</b> to determine the degree to which the provisioning environment supporting CLEC and Reseller orders is on parity with internal BA provisioning.</p>	<p>NONE</p>
<p><b>POP12: Provisioning Coordination Process Evaluation:</b></p> <p>This evaluation is conducted using live CLEC cases.</p> <p>The objectives of this evaluation are to:</p> <ul style="list-style-type: none"> <li>■ determine completeness and consistency of provisioning coordination processes.</li> <li>■ determine whether the provisioning coordination processes are correctly documented, maintained, and published.</li> <li>■ determine the accuracy, completeness, and functionality of procedures for measuring, tracking, projecting, and maintaining provisioning coordination</li> </ul>	<p><b>O&amp;P-5: Provisioning Verification Test:</b></p> <p>The objective of this test is to evaluate BellSouth's performance in the provisioning of UNEs as described in the Georgia Order. <i>(Other than identifying the UNEs and stating that provisioning will be tested, the Georgia Order does not address provisioning.)</i></p> <p>This evaluation will involve physical inspection <i>(appears to be conducted based on an appointment with BellSouth provisioners)</i></p>

**Key Differences Between Objectives Identified in  
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<p>processes performance.</p> <ul style="list-style-type: none"> <li>▪ ensure the provisioning coordination processes have effective management oversight.</li> <li>▪ ensure responsibilities for provisioning coordination processes performance improvement are defined and assigned.</li> </ul>	
<p><b>POP13: Scalability Review:</b> evaluate to determine the degree to which the POP environment can be scaled to accommodate order of magnitude increases in transaction volumes and users.</p>	<p><b>O&amp;P-6: Order Processing Systems Scalability Evaluation:</b> to determine the degree to which these applications and associated maintenance and support workforce can scale to accommodate projected YE01 transaction volumes and CLEC users.</p>

**Key Differences Between Objectives Identified in  
the New York and Georgia Third Party Test Plans**

**Maintenance & Repair**

New York (TAB V of Test Plan))	Georgia (TAB VII of Test Plan))
<p><b>M&amp;R1: Repair Administrative System Functional Evaluation:</b> to validate the existence and behavior of Repair Administrative System functional elements as documented in CLEC and Repair Administrative System Training Guides and other applicable documents and to evaluate the equivalence of the CLECs system functionality to their retail system.</p>	<p><b>M&amp;R TAFI Functional Test</b></p> <p>The objective of the TAFI Functional Test is to <i>validate the existence</i> of TAFI trouble reporting and screening functionality for telephone number assigned UNE customers in accordance with CLECTAFI End User Training and User Guide.</p> <p><b>M&amp;R-2 ECTA Functional Test</b></p> <p>The objective of the ECTA Functional Test is to <i>validate the existence</i> of ECTA trouble reporting and screening functionality for both telephone number assigned and circuit identified UNE customers in accordance with BellSouth's published specifications.</p>
<p><b>M&amp;R2: Repair Administrative System Performance Evaluation:</b> to evaluate the behavior of Repair Administrative System under <i>load</i> conditions, to determine system performance in terms of response time and operability, and to identify future performance bottlenecks.</p>	<p><b>M&amp;R-3 ECTA Normal Volume Performance Test</b></p> <p>The objective of the ECTA Normal Volume Performance Test is to measure the performance of the ECTA interface under normal projected YE01 transaction loads.</p> <p><b>M&amp;R-4 ECTA Peak Volume Performance Test</b></p> <p>The objective of the ECTA Peak Volume Performance Test is to measure the performance of the ECTA interface under peak projected YE01 transaction loads.</p> <p>No TAFI volume test is described in the plan.</p>

**Key Differences Between Objectives Identified in  
the New York and Georgia Third Party Test Plans**

<p><b>M&amp;R3: Repair Administrative System Scalability Evaluation:</b> to determine the degree to which the Repair Administrative System application can be scaled to accommodate order of magnitude increases in transaction volumes and users.</p>	<p><b>M&amp;R-6 ECTA and Scalability Evaluation</b></p> <p>The objective of this evaluation is to determine the degree to which the ECTA application and the associated maintenance and support workforce can scale to accommodate projected YE01 transaction volumes and CLEC users.</p> <p><b>M&amp;R -5 TAFI Scalability Evaluation</b></p> <p>The objective of this evaluation is to determine the degree to which the TAFI application and the associated maintenance and support workforce can scale to accommodate projected YE01 transaction volumes and CLEC users.</p>
<p><b>M&amp;R4: M&amp;R Process Performance Measurements Evaluation:</b> to evaluate the accuracy of BA performance measures of its Maintenance and Repair process as established in the interim guidelines for carrier-to-carrier performance standards and reports. The purpose is to determine their applicability/usability in testing the parity of BA's wholesale and retail Maintenance and Repair processes. The intent is to utilize existing metrics along with sampled CLEC trouble cases in <u>evaluating the equivalence of BA's wholesale and retail Maintenance and Repair operations in a subsequent test.</u> (See M&amp;R5 below.)</p>	<p>NONE</p>
<p><b>M&amp;R5: M&amp;R Process Evaluation:</b> to evaluate the equivalence of BA's end-to-end processes for trouble reporting and repair of retail and wholesale services.</p> <p>--Review of historical metrics --Sampling of CLEC trouble reports and their results and calculating relevant metrics. --Evaluation of trouble reports that fall out for manual handling.</p>	<p>NONE</p>

**Key Differences Between Objectives Identified in  
the New York and Georgia Third Party Test Plans**

<p>A comparison of results to standards or parity is conducted within the applicable objectives listed in this section.</p>	<p><b>M&amp;R 7 Performance Results Comparison</b></p> <p>The objective of the M&amp;R Performance Results Comparison is to assess the accuracy of BellSouth's wholesale performance metrics results using Build transactions.</p> <p>(Compare test results to results collected by BellSouth's performance measurement systems.)</p>
<p><b>M&amp;R6: M&amp;R Documentation Review:</b> to assess the overall quality of documentation produced by BA to assist CLECs in the Maintenance and Repair domain.</p>	<p><b>M&amp;R 8 TAFI Documentation Evaluation</b></p> <p>The objective of this evaluation is to assess whether the documentation provided by BellSouth adequately assists CLECS to understand how to implement and use all of the TAFI functions available to them.</p> <p><b>M&amp;R-9 ECTA Documentation Evaluation</b></p> <p>The objective of this evaluation is to assess whether the documentation provided by BellSouth adequately assists CLECs to understand how to implement and use all of the ECTA functions available to them.</p> <p>It is unclear if the specifications and rules to build interfaces will be reviewed, and no indication that an interface is built.</p>
<p><b>M&amp;R7: M&amp;R Work Center Support Evaluation:</b> to evaluate the effectiveness of M&amp;R work center support operations and adherence to common support center/help desk procedures. An additional objective is to analyze the nature and frequency of problems referred to the work center to determine if they indicate potential problems in other M&amp;R Domain areas. (e.g. Repair Administrative System)</p> <ul style="list-style-type: none"> <li>--Determine completeness and consistency of work center/help desk processes and procedures</li> <li>--Determine whether expedite and escalation procedures are correctly documented and work effectively</li> <li>--Ensure existence of reasonable security</li> </ul>	<p>NONE</p>

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measures to ensure integrity of work center/help desk data and the ability to restrict access to parties with specific access permissions --Determine the timeliness and accuracy in identifying and resolving problems --Determine the existence and functionality of procedures for measuring, tracking, projecting and maintaining work center/help desk performance	
<b>M&amp;R 8 M&amp;R Network Surveillance Support Evaluation:</b> to determine the functionality of network surveillance and network outage notification procedures and to assess the performance capabilities of network outage notification procedures for wholesale operations.	NONE
<b>M&amp;R9: M&amp;R Coordination Process Evaluation:</b> to determine the adequacy of M&R coordination processes and systems as they relate to joint CLEC/BA activities in the Maintenance and Repair domain.	NONE

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**Billing**

<b>New York (TAB VI of Test Plan))</b>	<b>Georgia (TAB VI of Test Plan))</b>
<b>BLG1-Billing Process Metrics Evaluation</b> The objective of this test is to evaluate the capture, tracking, and reporting of billing metrics required by regulatory bodies.	NONE
<b>BLG2-Billing Documentation Evaluation</b> The objectives of this evaluation are to: Determine the accuracy and usability of the billing documentation. Determine BA-NY's compliance of relevant billing outputs with the industry standards as stated in Appendix D Determine BA-NY's compliance with its CLEC documentation in regards to the technical format of the transmission.	<b>BLG-7 CRIS/CABS Invoicing Document Evaluation</b> The evaluation should analyze all aspects of the ability of a CLEC to interact with BellSouth's billing function based on review of the available invoicing process documentation. This evaluation will assess the overall quality and availability of documentation from BellSouth.  <i>(However, the plan states that the billing documentation evaluation will not determine whether system functionality matches functionality described in the documentation)</i>  <b>BLG-8 ODUF/ADUF Documentation Evaluation</b>  This evaluation should analyze all aspects of the ability of a CLEC to interact with BellSouth's billing function based on review of the available usage reporting process documentation. This evaluation will assess the overall quality and availability of documentation from BellSouth  <i>(However, the plan states that the billing documentation evaluation will not determine whether system functionality matches functionality described in the documentation)</i>
<b>BLG3-Billing Work Center/Help Desk Support Function</b>  The objectives of this evaluation are to: Determine completeness and consistency of work center/help desk processes and responses Determine whether the escalation procedure is correctly documented, maintained, published	NONE

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<p>and followed.</p> <p>Determine the accuracy, completeness, and functionality of procedures for measuring and tracking work center/help desk performance.</p> <p>Determine the accuracy, completeness and functionality of procedures for projecting resource needs and maintaining work center/help desk performance.</p> <p>Ensure the work center/help desk has effectiveness management oversight.</p> <p>Ensure responsibilities for performance improvement are defined and assigned.</p>	
<p><b>BLG4-Resale Bill Certification Process Evaluation</b></p> <p>The objectives of this evaluation are to:</p> <p>Determine the completeness and consistency of the bill certification processes.</p> <p>Determine the existence and functionality of procedures for measuring, tracking and reporting the bill certification process.</p> <p>Ensure responsibilities for performance improvement are defined and assigned.</p> <p>Verify the integrity of the process.</p>	NONE

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<p><b>BLG5-Usage Reject Process Evaluation</b> The objective of this evaluation is to determine the accuracy, completeness and reliability of reject information.</p>	<p><b>BLG-3 Billing Usage Returns Evaluation</b> The objective of the billing usage returns evaluation is to evaluate the process by which usage returns are processed and to test the BellSouth process of test usage returns. <i>(No evaluation criteria are provided)</i></p>
<p><b>BLG6-Functional Usage Evaluation</b> The objective of this test is to evaluate the following: --Accuracy of the usage on the DUF --Timeliness of the DUF delivery</p>	<p><b>BLG-2 ODUF/ADUF Usage Functional Test</b> The objective of this test is to assess accuracy and completeness of the daily usage file message processing capability as described in BellSouth's published specifications.  <i>(This test does not measure the accuracy of the usage contained in the file against the test calls, it only measures the timeframe in which messages are sent)</i></p>
<p><b>BLG7-Functional Bill Cycle Evaluation</b> The objective of this test is to evaluate the timely delivery of the bill and the accurate and timely appearance of charges on the appropriate bill. Appearance of the charges will depend on the type of products ordered and/or class of service changes for resale and UNE. Details to be evaluated include: --Appropriate proration of charges for new and/or disconnected service --Customer charges for what they have ordered are accurate (order matches billing) --New/disconnected products appear (or do not appear) on the bill. --Bill dates are correct and match appropriate date from provisioning process. --Payments and adjustments appear on the bill. --Bills are delivered to CLECs and Resellers in a timely manner</p>	<p><b>BLG-1 CRIS/CABS Invoicing Functional Test</b> The objective of this test is to validate the completeness and accuracy of the CRIS/CABS carrier billing and invoicing process in accordance with BellSouth's published specifications.  <i>(It is not clear from BellSouth's documentation that the evaluation details will be similar to those in New York. BellSouth's performance measures in Appendix D do not capture any of the required data except timeliness.)</i></p>
	<p><b>BLG-4 CRIS/CABS Invoicing Scalability Test</b> The objective of this evaluation is to determine the degree to which the CRIS/CABS applications and associated billing workforce can scale to accommodate projected YE01 transaction volumes.</p>
	<p><b>BLG-5 ODUF/ADUF Daily Usage Scalability Evaluation</b>  The objective of the this evaluation is to</p>

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	determine the degree to which the ODUF/ADUF reporting applications and associated billing workforce can scale to accommodate projected YE01 transaction volumes.
A comparison of results to standards or parity is conducted within the applicable objectives listed above.	<p><b>BLG-6 Billing Performance Results Comparison</b></p> <p>The objective of the comparison is to assess the accuracy of BellSouth's wholesale performance metrics results using test transactions.</p>

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**Relationship Management and Infrastructure Test**

<b>New York (TAB VII of Test Plan))</b>	<b>Georgia (TAB VIII of Test Plan))</b>
<b>RMI1-Change Management Practices Verification and Validation</b>  The objectives of this test are to determine the adequacy and completeness of procedures for developing, publicizing, conducting, and monitoring change management.	<b>FCM-2 Change Management Practices Review</b>  The objective of this test is to assess the adequacy and completeness of procedures for the developing, publicizing, conducting, and monitoring change management.
<b>RMI2- Interface Development Verification and Validation Review</b>  The objectives of this test are to determine the adequacy and completeness of key policies and procedures for developing and maintaining interfaces.	NONE
<b>RMI3-Account Establishment and Management Verification and Validation Review</b>  The objectives of this test are to determine the adequacy and completeness of key procedures for developing, publicizing, conducting, and monitoring account management.	NONE
<b>RMI4-Account Establishment and Management Performance Data Review</b>  The objectives of this test are to determine compliance of the account management with response time norms.	NONE
<b>RMI5-Network Design Request, Collocation, and Interconnection Planning Verification and Validation Review</b>  The objectives of this test are to: --Determine whether the CLEC has sufficient information to adequately prepare for NDR, Collocation and Interconnection planning. --Determine whether the NDR planning process is sufficiently well structured and managed to yield the desired results. --Determine whether the collocation planning process is sufficiently well structured and managed to yield the desired results. -- Determine whether the Interconnection	NONE

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planning process is sufficiently well structured and managed to yield the desired results.	
<b>RMI6-System Administration Help Desk Functional Review</b>  The objectives of this test are to:  Determine completeness and consistency of overall system administration help desk. Determine whether the escalation procedure is correctly maintained, documented, and published. Determine the existence and functionality of procedures for measuring, tracking, projecting and maintaining system administration help desk performance. Ensure existence of reasonable security measures to ensure the integrity of system administration help desk data and the ability to restrict access to parties with specific access permission. Ensure the overall help desk effort has effective management oversight. Ensure responsibilities for performance improvement are defined and assigned.	NONE
<b>RMI7-System Administration Help Desk Performance Data Review</b>  The objectives of this test are to:  --determine timeliness of help desk process from inception to closure. --determine the accuracy of responses and closure postings.	NONE
<b>RMI8-- System Administration Help Desk Verification and Validation Review</b>  The objectives of this test are to validate the: --usability of user interface --accuracy and completeness of call logging and severity coding	NONE
<b>RMI9-CLEC Training Verification and Validation Review</b>  The objectives of this test are to: Determine the existence and functionality of	NONE

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procedures for developing, publicizing, conducting, and monitoring CLEC training. Ensure the CLEC training effort has effective management oversight.	
<b>RMI10-Forecasting Verification and Validation Review</b>  The objectives of this test are to: Determine the existence and functionality of key procedures for developing, publicizing, conducting, and monitoring forecasting efforts.  Ensure the overall forecasting effort has effective management oversight.	<b>FCM-1 Forecasting Process Review</b>  The objectives of this test are to determine the existence and functionality of key procedures for developing, publicizing, conducting, and monitoring forecasting efforts, as well as ensuring the overall forecasting process has appropriate and effective management oversight.

# Key Differences Between Objectives Identified in the New York and Georgia Third Party Test Plans

## Phase II Overview

New York (TAB VIII of Test Plan)	Georgia
<p>This tab provides details on roles and responsibilities, and the activities to be performed by each stakeholder (PSC, ILEC, KPMG, HP, and CLECs). It includes:</p> <ul style="list-style-type: none"> <li>Test Plan Development Framework</li> <li>Phase II Organization</li> <li>Major Stakeholders and Roles</li> <li>Phase II Test Management Tasks</li> <li>Phase II Test Execution Tasks</li> <li>Phase II Responsibilities</li> <li>Test Execution Responsibilities</li> <li>Phase II Project Schedule</li> <li>Phase II Milestones/Dependencies</li> <li>Testing Controls</li> </ul>	<p>No similar section exists in the Georgia plan.</p> <p><i>(It is unclear from the Georgia plan who performs the role of the test manager performed by KPMG in New York.)</i></p>

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**Volume**

<b>New York (Appendix C of Test Plan))</b>	<b>Georgia (Appendix C of Test Plan))</b>
Methodology for establishing volumes described (Section D-Data Development)	Process addressed briefly and generally, but specifics not described.
Pre-Order, Order, and Troubles defined by product type on a daily basis. Peak volumes are assumed to be 150% of normal volumes. —	Not defined. Peak volumes not defined.

# **Key Differences Between Objectives Identified in the New York and Georgia Third Party Test Plans**

## **Performance Metrics**

<b>New York (Appendix E of Test Plan))</b>	<b>Georgia (Appendix D of Test Plan))</b>
Contains standards for many quantitative metrics (Including parity with retail) or states that standards are to be determined.	No standards defined for performance metrics.
Qualitative metrics have criteria/norms and standards defined.	None defined.
Statistical Approach (Appendix D)  Describes statistical approach.	States that evaluation criteria will be developed for each test to determine whether the results deviate from expectations. In those cases where results deviate, statistical analysis will be undertaken to determine the significance of the deviation. (Process is not defined)